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October 28, 2014

VIA ECF

Hon. Jesse M. Furman
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Chefs Diet Acquisition Corp. v. Lean Chefs, LLC et. al.*, 14-CV-8467 (JMF)

Dear Judge Furman:

I write this letter on behalf of the Defendants to clarify one point that appears to have been lost in communications in Plaintiff's counsel's letter to the Court submitted this afternoon, the final draft of which went out before Defendants' counsel had an opportunity to review. Defendants are agreeable to produce all their data relating to their customer/prospective customer information by November 24, 2014, at the same time of Defendants' proposed dates for the parties responses to the parties' discovery requests served on November 3, 2014. As Defendants' counsel noted at the hearing on October 24, 2014, counsel understands that there are over half a million items of data relating to Defendants' customer information that may be stored on multiple computers and it will take a few weeks to thoroughly search, pull all this data and produce. Accordingly, Plaintiff's proposed date for production of this data by next week (November 5th) is just not realistic and cannot be met by Defendants. Defendants' appreciate the Court's attention to this matter.

Respectfully submitted,

Darius Keyhani

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